

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In re:)	
)	
GARRETT G. HOLLMAN,)	Case No. 09-13376-BFK
)	Chapter 7
Debtor.)	

**TRUSTEE'S MOTION TO APPROVE SALE OF ESTATE ASSET
TO JAMES AND BARBARA MINER**

Klinette H. Kindred, Chapter 7 Trustee, ("Trustee"), by and through undersigned counsel, pursuant to 11 U.S.C. Sec. 363(b) and F.R. Bankr.P.6004, moves this Court for an Order approving the Trustee's sale of Estate Asset to Barbara Miner, as follows:

1. This case was originally filed as a Chapter 11 case, and was converted to one under Chapter 7 on September 1, 2010.
2. Klinette H. Kindred is the duly qualified and acting Chapter 7 Trustee, having been appointed by Order of this Court on October 12, 2010.
3. Madeline A. Trainor was appointed as counsel for the Trustee by Order of this Court on February 3, 2011.
4. The Debtor, Garrett Hollman listed an asset on his bankruptcy schedules which was described as a 20% interest in The 1412 LLC.
5. The Chapter 7 Trustee has succeeded by operation of law as owner of the Debtor's non-exempt assets, including this described asset.
6. James and Barbara Miner wish to purchase the 20% interest in 1412 LLC from the Chapter 7 Trustee.

7. James and Barbara Miner have offered to pay to Klinette H. Kindred, the Chapter 7 Trustee the sum of \$5,000.00 (Five Thousand Dollars and No Cents) to purchase this asset.
8. In exchange for \$5,000.00 paid to the Estate, Klinette H. Kindred will sell, assign and transfer her rights, title and interest in the 20% interest in The 1412 LLC.
9. The Trustee has entered into an Agreement, the terms of which reflect the agreement between the parties (executed copy attached as Exhibit "1")
10. The sale is subject to Bankruptcy Court approval.
11. In the Trustee's opinion and business judgment, this sale is in the best interest of the creditors and the estate.

WHEREFORE, the Trustee prays for entry of an Order of this Court approving the Sale of this Asset to James and Barbara Miner pursuant to the terms of the executed Agreement, and for such other and further relief as the Court deems appropriate.

October 7, 2011

Respectfully submitted,

Klinette H. Kindred
Chapter 7 Trustee

By Counsel

/s/ Madeline A. Trainor

Madeline A. Trainor, Esq. (VSB #18531)

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Counsel for Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2011, a true copy of the foregoing Motion was served by email or first class mail to all creditors and other parties in interest as maintained on the service list attached hereto.

/s/ Madeline A. Trainor

Madeline A. Trainor, Esq. (VSB #18531)